

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

LINDA FLINT EDGE,)	
Plaintiff,)	
)	
v.)	No. 04-12134 DPW
)	
NORFOLK FINANCIAL CORPORATION)	
and DANIEL W. GOLDSTONE,)	
Defendants.)	

**PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION
FOR LEAVE TO FILE BRIEF SURREPLY, AND SURREPLY TO
PLAINTIFF'S PETITION FOR ATTORNEY'S FEES**

The Plaintiff opposes Defendants' motion / surreply on the following grounds:

1. Plaintiff's reply to Defendants' opposition to her attorney's fee petition raised no new issues outside those raised in Defendants' opposition. Defendants had a full opportunity to oppose Plaintiff's fee petition and offer support therefor in their opposition previously filed.
2. The motion / surreply filed by Defendants contains nothing new of any relevance to Plaintiff's fee petition. Like their opposition, it contains factual inaccuracies¹ and erroneous and imagined presumptions that would require another memorandum and declaration to fully address. Should the Court so desire, Plaintiff would certainly be willing to provide a response.

WHEREFORE, Plaintiff respectfully requests this Court deny Defendants' motion.

Dated: June 27, 2005

s/Yvonne W. Rosmarin
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¹ E.g., Defendants' description of Plaintiff's counsel as merely local counsel on *Martin v. Sands* is incorrect. Plaintiff's counsel served as co-counsel, not local counsel, on that case and spent 299.4 hours working on that case between February, 1998 and January, 2001. Plaintiff's counsel has *never* served as merely local counsel on *any* case.